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7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,

Case No. 2:22-mj-00638-DJA

9 Plaintiff,

10 v.

11 OSCAR ALEJANDRO GARCIA-LUQUIN,
12 aka "Oscar Garcia,"
13 aka "Oscar Luquin,"
14 aka "Oscar Garcia Luquin,"
15 aka "Jose Ramon Lopez,"
16 aka "Jose Alfredo Lopez,"
17 aka "Moises Juarez,"
18 aka "Moises Cervantes Juarez,"
19 aka "Fernando Montoya-Reyes,"
aka "Jose Guzman,"
aka "Geraldo Vegas,"
aka "Carlos Ernesto Perez,"

Defendant.

**Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report**

20 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
21 Frierson, United States Attorney, and Jared L. Grimmer, Assistant United States Attorney,
22 counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and
23 Nisha Brooks-Whittington, Assistant Federal Public Defender, counsel for Defendant

1 OSCAR ALEJANDRO GARCIA-LUQUIN, that the Court direct the U.S. Probation
2 Office to prepare a report detailing the defendant's criminal history.

3 This stipulation is entered into for the following reasons:

4 1. The United States Attorney's Office has developed an early disposition
5 program for immigration cases, authorized by the Attorney General pursuant to the
6 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has
7 extended to the defendant a plea offer in which the parties would agree to jointly request an
8 expedited sentencing immediately after the defendant enters a guilty plea.

9 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
10 history until after the defendant enters his guilty plea unless the Court enters an order
11 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
12 a defendant's initial appearance when charged by indictment.

13 3. The U.S. Probation Office informs the government that it would like to begin
14 obtaining the criminal history of defendants eligible for the early disposition program as
15 soon as possible after their initial appearance so that the Probation Office can complete the
16 Presentence Investigation Report by the time of the expected expedited sentencing.

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4. Accordingly, the parties request that the Court enter an order directing the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

DATED this 17th day of August, 2022.

Respectfully Submitted,

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

/s/ Nisha Brooks-Whittington
NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender
Counsel for Defendant OSCAR
ALEJANDRO GARCIA-LUQUIN

/s/ Jared L. Grimmer
JARED L. GRIMMER
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:22-mj-00638-DJA

Plaintiff,

Order Directing Probation to Prepare a Criminal History Report

V.

OSCAR ALEJANDRO GARCIA-LUQUIN,

aka "Oscar Garcia,"
aka "Oscar Luquin,"
aka "Oscar Garcia Luquin,"
aka "Jose Ramon Lopez,"
aka "Jose Alfredo Lopez,"
aka "Moises Juarez,"
aka "Moises Cervantes Juarez"
aka "Fernando Montoya-Rey"
aka "Jose Guzman,"
aka "Geraldo Vegas,"
aka "Carlos Ernesto Perez,"

Defendant.

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 18th day of August, 2022.



HONORABLE DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE